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Daniel E. Morris, Esq.
Daniel E. Morris Law Firm, PLLC
P.O. Box 40811
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VIA EMAIL to DanielMorris@demlawfirm.com

RE: *Shantell and Edward Hayes v. Regional Enterprises, LLC et al.*

Dear Attorney Morris,

On July 18, 2023 I traveled to the home purchased by your clients, Shantell and Edward Hayes (Sometimes as “Your Clients” and “Customers”), from our client, Regional Enterprises, LLC (“Regional”) for an inspection in Ethel, Louisiana prior to our mediation/arbitration of your clients’ claims. Your clients purchased a 2020 Deer Valley with Serial No. DVAL1200860AB (the “Home”) from Regional d/b/a McComb Home Center, a manufactured home retailer, on May 11, 2021

The list of issues your clients identified in their Demand Brochure are as follows:

1. Breaches to the outside throughout the home.
2. The 1 ½ inch gap in the floor is covered with stripping.
3. The master bathroom has missing tile and a sinking floor.
4. The master bedroom and bathroom have uneven walls, fixtures that don’t work, an uneven ceiling and multiple other issues.
5. The kitchen light fixture has fallen twice.
6. The exterior doors are either hung where they don’t close properly, or they are rotting.
7. The second bedroom has a crack in the floor and is exposed to exterior elements.
8. The laundry room’s floor is uneven.
9. There are numerous cracks in the sheetrock near all the windows.
10. There are nail holes throughout the home.
11. There is sheetrock work that has not been completed.
12. There is painting that has not been completed.
13. There are issues with the electrical work inside the home that are faulty.
14. The skirting has never been put on the home.

15. There are numerous other issues with the home.

At the inspection, your clients had marked the alleged defects and/or issues with red tape. This report will examine each of your clients' allegations to identify whether these are manufacturing defects, lack of completion of the trim out of the home, or other issues.

Breaches to the Outside throughout the home







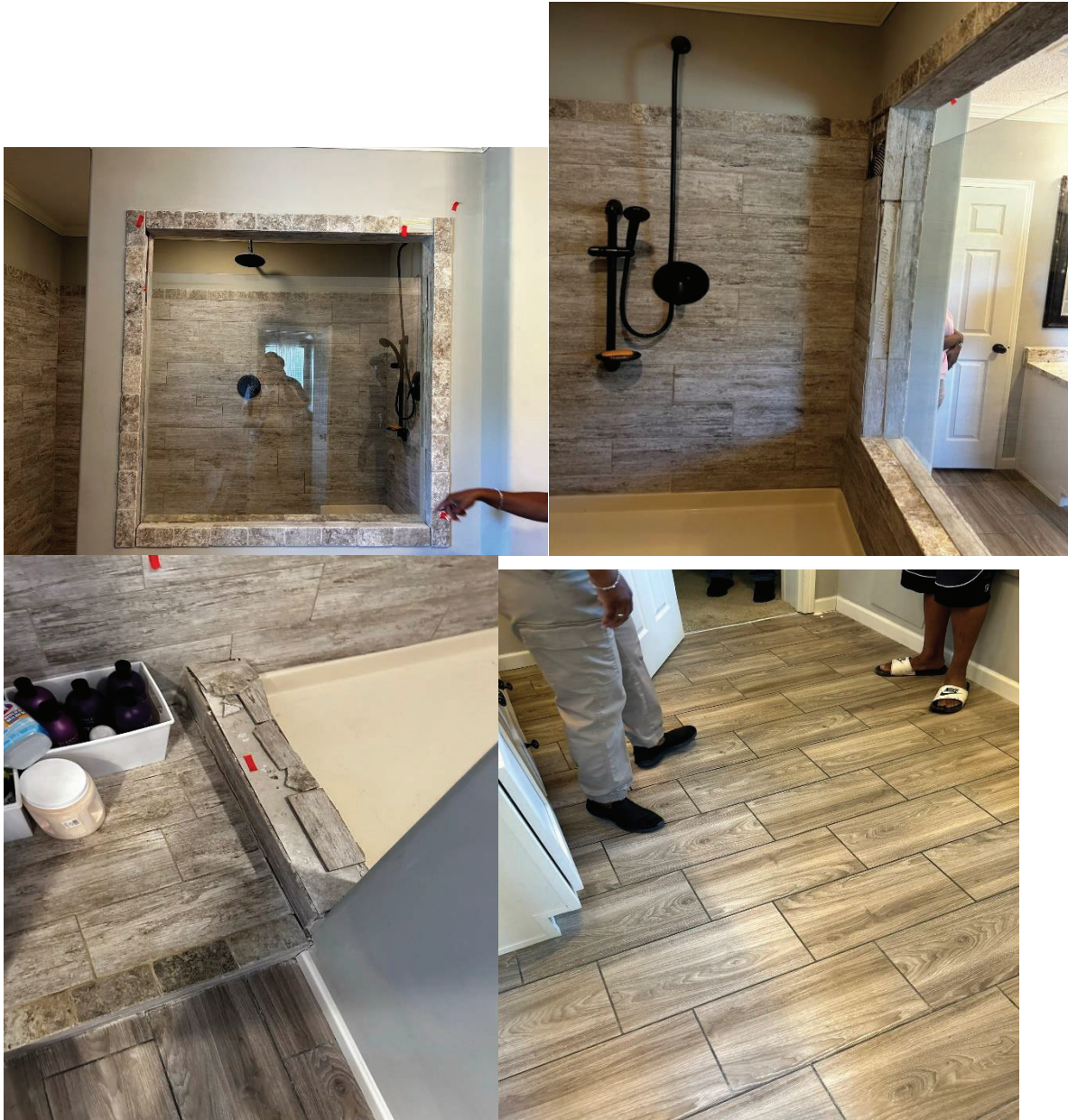
- As far as “breaches to the outside” from the home these are the only identifiable photographs of alleged issues that could arguably meet that definition as observed at the inspection and identified by your clients. As for the end of the home with skirting removed, it is our position that your clients had the skirting removed and the trim and siding at the top of the home removed in order to have someone look at it or to perform attempted repairs of the alleged issues. Your clients stated that a contractor performed work on the exterior of the home at the marriage line. Furthermore, this could potentially be a manufacturing issue if the home was not framed properly at the factory, resulting in gapping between the halves. Since there was no visible gap at the floor in this same position, that seems to be the case. The exterior door on the back porch had a gap at the top corner where light was visible. This issue appears to just need a slight adjustment to level out the door in the frame. There were no other “breaches to the outside” visible at the inspection.

The 1 ½ inch gap in the floor is covered with stripping.



- At the inspection and as shown above, the marriage line of the home did not have any “stripping” present. The initial demand we received that indicated that there was “stripping” present at some point. Was the transition bar removed by your clients prior to the inspection? If not, that piece should be acquired through request to the manufacturer. Furthermore, based on how the flooring is laid, this home never was equipped with a seamless floor as alleged. The gap in the floor is typical for this home and should be covered by a transition bar (referred to as stripping in the demand), per industry standards.

The master bathroom has missing tile and a sinking floor.



- Missing tiles were observed in the bathroom. The missing tile in the bathroom is a manufacturing issue. There did not seem to be any apparent issues with the floor. A report or expert opinion would be needed to support this contention. With any conventional foundation, variations in the floor between support joists is a normal occurrence and does not reflect a foundation or structural problem. It is worth noting here that your clients did construct the pad or had their own contractor construct the pad in this home, so the dirt work company would need to be looked to for any problems with the foundation or pad of the home.

The master bedroom and bathroom have uneven walls, fixtures that don't work, an uneven ceiling and multiple other issues.



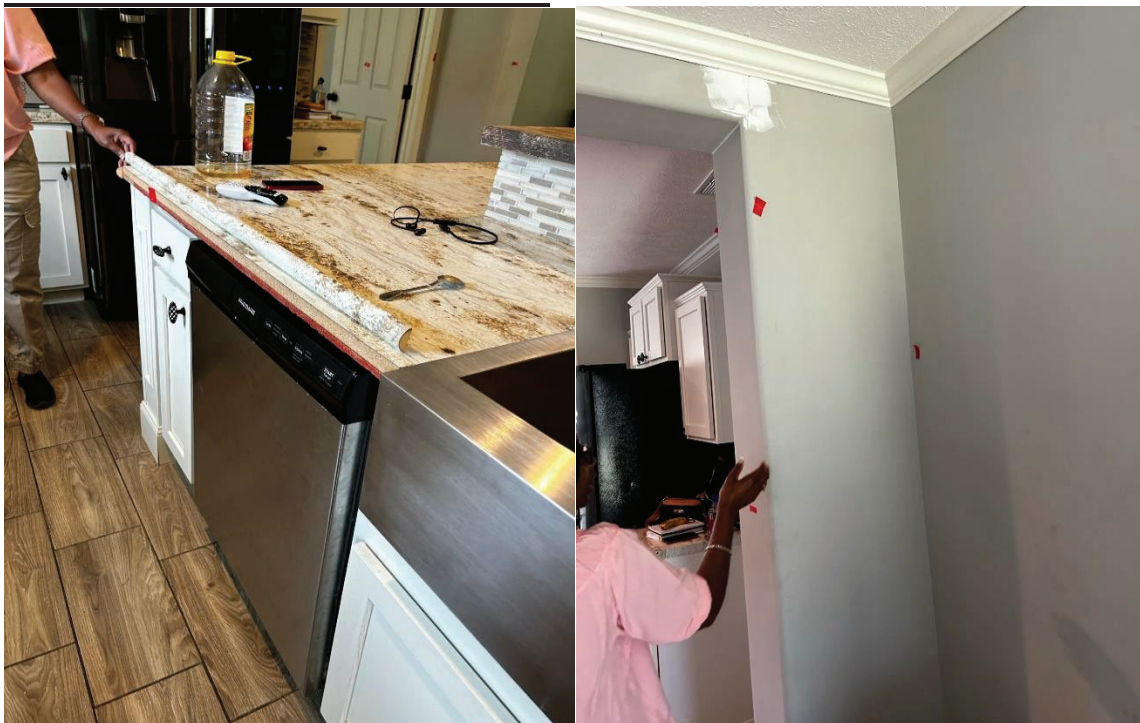






- No uneven walls or ceilings were observed during the inspection, but if this claim is substantiated, it would be a manufacturing issue. Any unfinished trim or unfinished paint was in the process of being completed by the trim out crews and can still be finished, by Regional's contractors or a contractor as hired by your clients. Cracks were observed in a few places, but nothing to indicate any structural defects. Your client stated that the door to the master bedroom was "used". It just appeared to have smudges and dirt on it which could be cleaned off or painted over. One bulb was not working over the master bathroom sink and your clients reported replacing same but it still did not work. Your client reported issues with the ceiling and trim around the master bath entry. To the extent these issues are cosmetic, they would have been finished by my client during the trim out portion of the job if your client would have allowed them enough time to complete same. If there are any structural issues with the walls and ceiling, that would be a claim to make against the manufacturer.

The kitchen light fixture has fallen twice. The exterior doors are either hung where they don't close properly, or they are rotting.





- In the kitchen/living room, the light was attached and your clients did not report any continuing issues about same during the inspection. If there still exists an issue with the light, that would be a manufacturing issue as well. Your clients pointed out some issues with trim and countertops in the kitchen as shown in photographs. These would be manufacturing issues as well. Your clients also reported that the microwave turned on, but did not heat up her food. This would be an issue with the appliance manufacturer and whatever warranty, if any, came with it. Your clients reported a hairline crack on the ceiling which appeared to have been repaired, but not painted. There did not seem to be any further problems with the area, so a fresh coat of paint and or some joint compound would resolve same. Your clients also reported that the entry door was rotting at the base and the same issues with the other exterior doors. This would be an issue for the manufacturer, as the exterior doors came installed on the home from the factory.

The second bedroom has a crack in the floor and is exposed to exterior elements.

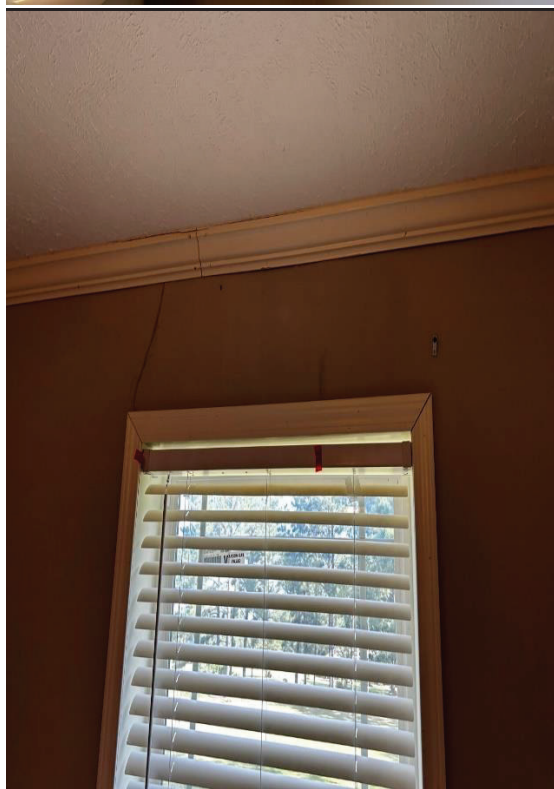
- This issue was not observed nor reported by your clients at the inspection. With further information and documentation, my client would be able to determine whose responsibility it would be to fix the alleged crack in the floor.

The laundry room's floor is uneven.

- No apparent or obvious issue was apparent with the laundry room floor at the inspection. As cited above, an expert opinion or report detailing any foundation issues or structural issues would be required to determine if anything is defective with the floor.

There are numerous cracks in the sheetrock near all the windows.

Windows with cracks





- Cracks in sheetrock near windows is expected from the transport and setup of a manufactured home. The trim crews were in the process of repairing the cosmetic issues with the home, and these issues just need some cosmetic repair. As cited throughout this response, any foundation issues will need to be substantiated by an expert in order to

determine the cause of said issues, whether it is due to the manufacturer, the dirt pad, the set up and installation crew, or otherwise.

There are nail holes throughout the home.

- There were no nail holes observed in the walls, only raised places where nails/screws were apparently backing out of the wall. Any nails backing out of the sheetrock would be a manufacturing issue. The trim was not finished in multiple places, leaving nail holes unfilled and unfinished on the trim. When your client notified Regional to cease the work due to the dispute, this work was not completed. However, the trim out can be completed and these issues would easily be addressed by a qualified contractor.



**Raised nail head*



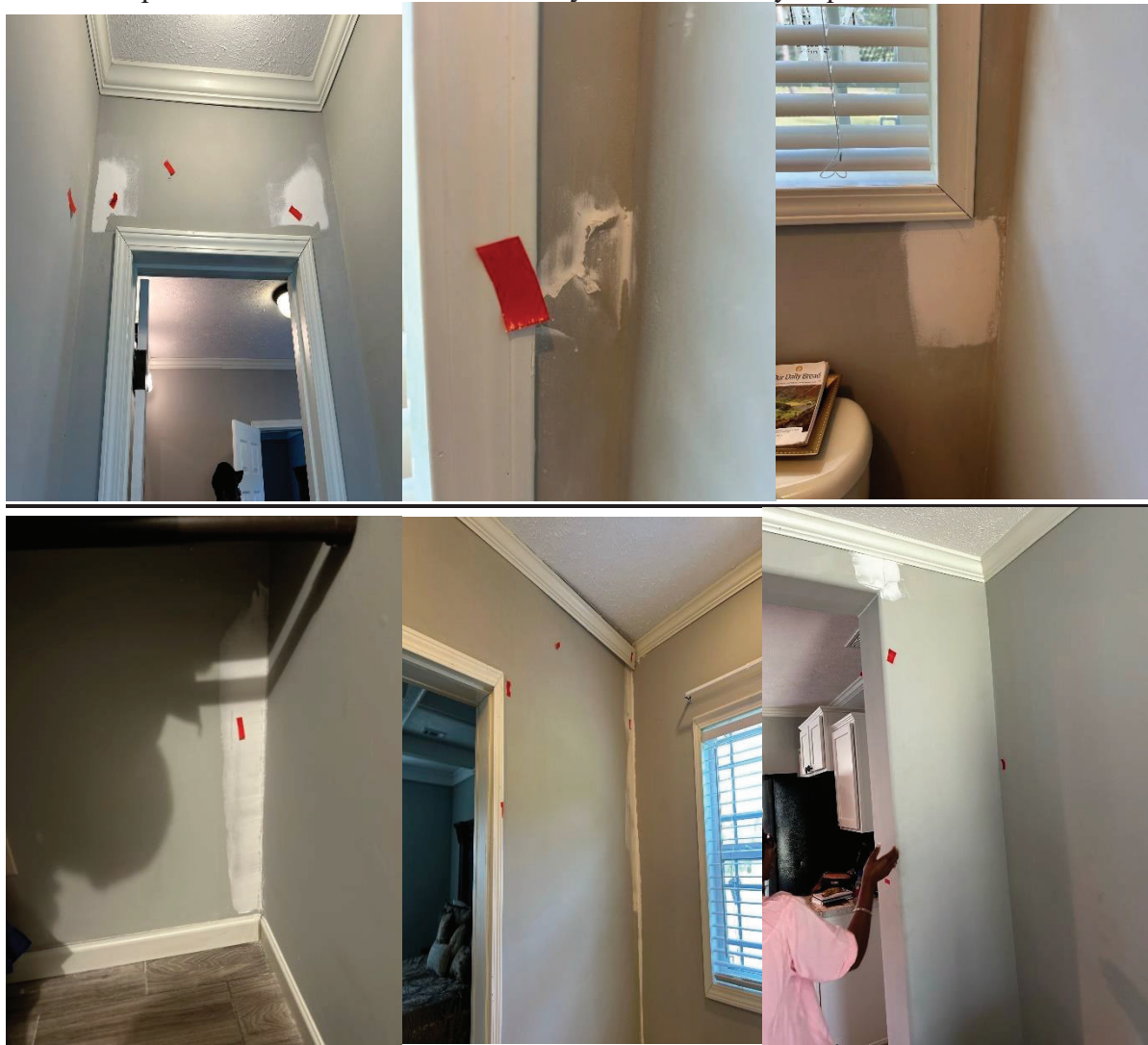
** unfinished trim*

There is sheetrock work that has not been completed.

There is painting that has not been completed.

- There were several instances in every room where painting/sheetrock was not completed. Regional's position is that this is due to your clients instructing McComb Home Center employees not to come back to the property before the trim-out was complete. The customers were also not happy about some textured painting done on the walls in one hallway as it was not uniform with the rest of the house. There was also one bedroom that

was painted partly with a high gloss paint and partly a flat paint. However, the trim out can be completed and these issues would easily be addressed by a qualified contractor.





There are issues with the electrical work inside the home that are faulty.

- Your client demonstrated one light in the hallway that would flicker on then turn off and a malfunctioning light in the master bathroom. No other electrical issues were reported or observed. The issues with electrical work would be an issue to take up with the manufacturer as well.

The skirting has never been put on the home.

- Skirting was on the home with the exception of one section, which, in the opinion of Regional, was removed by your clients or at their instruction. The materials were on the ground for that section and can easily be popped back into place.





There are numerous other issues with the home.

Your clients pointed out an issue with shingles and or ridge caps on the roof. This would be a claim to make to the manufacturer of the home.

Thank you for your attention to this matter. We look forward to your response and are hopeful a resolution can be reached between Regional and your clients.

Thank you,

/s/ J.D. Sanford

Cc: Regional Enterprises, LLC